

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**PC Indiana Synthetic Fuels #2, LLC
7244 Brammer Road
Lynnville, IN 47619**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T173-13823-00041	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 19, 2002 Expiration Date: March 19, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a synthetic fuel pellet production and curing operation.

Responsible Official:	Douglas E. Miller/President
Source Address:	7244 Brammer Road, Lynnville, IN 47619
Mailing Address:	3211D Frederica Street, Owensboro, KY 42301
General Source Phone Number:	(270) 316-7838
SIC Code:	2999
County Location:	Warrick
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b, consisting of:
 - (1) two (2) liquid propane gas fired vibrating curing furnances using natural gas as a backup fuel, identified as Dryers EP02a and EP02b, respectively, each with a maximum capacity of one hundred forty (140) tons of pellets per hour, each with a rated heat input of 40 million British thermal units (MMBtu) per hour, each using two (2) cyclones as an integral part of the process, and each exhausting through one (1) wet scrubber to stack SV02a and SV02b, respectively;
- (b) Conveying for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons per hour, consisting of:
 - (1) one (1) pellet conveyor (EP01), one (1) dry pellet conveyer (EP03), one (1) loadout conveyor (EP06), each with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
- (c) Unloading for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons per hour, consisting of:
 - (1) two (2) collection hopper furnace discharges, identified as EP05 and EP07, each with a maximum capacity of one hundred forty (140) tons of pellets per hour and exhausting fugitively;
 - (2) one (1) truck loading operation, identified as EP08, with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
- (d) Conveying for the synthetic fuel pellet production operations, consisting of:

- (1) two (2) feed bins with variable speed feed conveyors (EP14 and EP15), two (2) pellet feed conveyors (EP19 and EP20), each with a maximum capacity of one hundred forty (140) tons of pellets per hour and exhausting fugitively;
 - (2) one (1) feed conveyor (EP11), one (1) mixer feed conveyor (EP12), two (2) pugmill conveyors (EP13 and EP17), one (1) mixer product conveyor (EP18), one (1) finished product collecting conveyor (EP09), one (1) pellet transfer conveyor (EP10), each with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
 - (3) one (1) recycle conveyor (EP21) with a maximum capacity of two (2) tons of pellets per hour and exhausting fugitively.
- (e) Screening for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons of pellets per hour, consisting of:
- (1) one (1) plant protection screen (EP16), with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively; and
- (f) One (1) radial stacker, identified as EP04, for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons of pellets and exhausting fugitively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
[326 IAC 6-5]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1.

When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V

Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Southwest Regional Office 812-436-2579.
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated
 - (2) revised, or
 - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance

of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;

- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on March 23, 1998. The plan consists of:
- (a) wet suppression of dust from unpaved haul roads on an as needed basis.
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet

on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the

Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (b) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation of this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for

recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b, consisting of:
 - (1) two (2) liquid propane gas fired vibrating curing furnaces using natural gas as a backup fuel, identified as Dryers EP02a and EP02b, respectively, each with a maximum capacity of one hundred forty (140) tons of pellets per hour, each with a rated heat input of 40 million British thermal units (MMBtu) per hour, each using two (2) cyclones as an integral part of the process, and each exhausting through one (1) wet scrubber to stack SV02a and SV02b, respectively;
- (b) Conveying for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons per hour, consisting of:
 - (1) one (1) pellet conveyor (EP01), one (1) dry pellet conveyor (EP03), one (1) loadout conveyor (EP06), each with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
- (c) Unloading for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons per hour, consisting of:
 - (1) two (2) collection hopper furnace discharges, identifies as EP05 and EP07, each with a maximum capacity of one hundred forty (140) tons of pellets per hour and exhausting fugitively.
 - (2) one (1) truck loading operation, identified as EP08, with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
- (d) Conveying for the synthetic fuel pellet production operations, consisting of:
 - (1) two (2) feed bins with variable speed feed conveyors (EP14 and EP15), two (2) pellet feed conveyors (EP19 and EP20), each with a maximum capacity of one hundred forty (140) tons of pellets per hour and exhausting fugitively;
 - (2) one (1) feed conveyor (EP11), one (1) mixer feed conveyor (EP12), two (2) pugmill conveyors (EP13 and EP17), one (1) mixer product conveyor (EP18), one (1) finished product collecting conveyor (EP09), one (1) pellet transfer conveyor (EP10), each with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
 - (3) one (1) recycle conveyor (EP21) with a maximum capacity of two (2) tons of pellets per hour and exhausting fugitively.
- (e) Screening for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons of pellets per hour, consisting of:
 - (1) one (1) plant protection screen (EP16), with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively; and
- (f) One (1) radial stacker, identified as EP04, for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) from the synthetic fuel pellet production and curing operation shall be limited by the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty

thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
synthetic fuel pellet production and curing operation, EP02a	140	54.72
synthetic fuel pellet production and curing operation, EP02b	140	54.72

The synthetic fuel pellet production and curing operation, identified as EP02a and EP02b, utilizes dual cyclones and wet scrubbers for particulate matter control in order to comply with 326 IAC 6-3-2 (Process Operations). The particulate matter emissions from the rest of the source are in compliance with 326 IAC 6-3-2 without any add on control equipment.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to CP 173-10815-00041, issued on August 13, 1999, Amended by 173-13829-00041, issued on June 12, 2001, for the fuel pellet production and curing operations, EP02a and EP02b, the particulate matter (PM) and the particulate matter less than 10 microns (PM10) emissions shall be limited to less than 0.12 pounds per ton. For the radial stacker, screens, loading, conveyors, the particulate matter less than 10 microns emissions shall be limited to less than 0.08 pounds per ton. Compliance with these limits make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Particulate matter equals particulate matter less than 10 microns. For the radial stacker, screens, loading, conveyors, compliance with this limit will also satisfy rule 6-3.
- (b) Any increase in emissions that exceed two hundred fifty (250) tons per year shall require prior approval by IDEM, OAQ.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

The dual cyclones and wet scrubbers for PM control shall be in operation at all times when the two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b, stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start-up or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emissions is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop and flow rate across the wet scrubbers used in conjunction with the two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b, at least once per shift when EP02a and EP02b are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the wet scrubbers is outside the normal range of 11.0 and 25.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling two(2) synthetic fuel pellet production and curing operation, identified as EP02a and EP02b, when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.8 Failure Detection

In the event that cyclone and/or wet scrubber failure has been observed.

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section

B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.5, the Permittee shall maintain records of daily visible emission notations of the two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b stack exhaust.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following as pertains to the wet scrubbers:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Pressure drop across the wet scrubbers.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the cyclone inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6-5]

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the manufacturing activities shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Fugitive Dust Emissions [326 IAC 6-4]

Pursuant to this rule, the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM [326 IAC 6-4-5(c)].

D.2.3 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on March 23, 1998. The plan consists of:

- (a) wet suppression of dust from unpaved haul roads on an as needed basis.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: PC Indiana Synthetic Fuels #2, LLC
Source Address: 7244 Brammer Road, Lynnville, IN 47619
Mailing Address: 3211D Frederica Street, Owensboro, KY 42301
Part 70 Permit No.: T173-13823-00041

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: PC Indiana Synthetic Fuels #2, LLC
Source Address: 7244 Brammer Road, Lynnville, IN 47619
Mailing Address: 3211D Frederica Street, Owensboro, KY 42301
Part 70 Permit No.: T173-13823-00041

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><input type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: PC Indiana Synthetic Fuels #2, LLC
Source Address: 7244 Brammer Road, Lynnville, IN 47619
Mailing Address: 3211D Frederica Street, Owensboro, KY 42301
Part 70 Permit No.: T173-13823-00041

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: PC Indiana Synthetic Fuels #2, LLC
 Source Location: 7244 Brammer Road, Lynnville, IN 47619
 County: Warrick
 SIC Code: 2999
 Operation Permit No.: T173-13823-00041
 Permit Reviewer: Amy Cook

On September 12, 2001, the Office of Air Quality (OAQ) had a notice published in the Boonville Standard, Boonville, Indiana, stating that PC Indiana Synthetic Fuels #2, LLC had applied for a Part 70 Operating Permit to operate a synthetic fuel pellet production and curing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1: Condition D.1.2 - The CP # 173-10815-00041, where the PSD limit originated should be cited. The PSD minor limit was created in Construction Permit (CP) # 173-10815, was modified in Amendment # 173-13829, and was included in the draft Part 70 Operating Permit # 173-13823. The draft permit did not reference the CP because this condition was modified by another permit action. However, IDEM, OAQ, should identify the CP since that is where the authority to create the condition originated. In addition, the Amendment is now cited for further clarity.

Condition D.1.2 has been revised as follows:

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

-
- (a) **Pursuant to CP 173-10815-00041, issued on August 13, 1999, Amended by 173-13829-00041, issued on June 12, 2001**, for the fuel pellet production and curing operations, EP02a and EP02b, the particulate matter (PM) and the particulate matter less than 10 microns (PM10) emissions shall be limited to less than 0.12 pounds per ton. For the radial stacker, screens, loading, conveyors, the particulate matter less than 10 microns emissions shall be limited to less than 0.08 pounds per ton. Compliance with these limits make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Particulate matter equals particulate matter less than 10 microns. For the radial stacker, screens, loading, conveyors, compliance with this limit will also satisfy rule 6-3.
- (b) Any increase in emissions that exceed two hundred fifty (250) tons per year shall require prior approval by IDEM, OAQ.

2: The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns

regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

Conditions B.15 and D.1.6 have been revised as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- (2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop **and flow rate** across the wet scrubbers used in conjunction with the two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b, at least once per shift when the two (2) synthetic fuel pellet production and curing operations are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise, When for any one reading, the pressure drop across the baghouse shall be maintained within is outside the normal range of 11.0 and 25.0 inches of water or a range established during the latest stack test. The ,the~~ **Permittee shall take reasonable response steps in accordance with Section C- Compliance**

Response Plan - **Failure to Take Response Steps**. ~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance Monitoring **Response Plan - Failure to Take Response Steps**, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

3: Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ, has revised C.9 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by a responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has revised C.19 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

Conditions C.9 and C.19 have been revised as follows:

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.19 **Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]**
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

4: The IDEM, OAQ has restructured C.18 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications.

Condition C.18 has been revised as follows:

C.18 Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

- ~~(1) This condition;~~
- ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) **A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:**

~~(A) (1) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's

current Compliance Response Plan; or

- (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
- (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
- (4) **Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The Permittee is excused from taking** **not required to take any** further response steps for any of the following reasons:

 - (1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)~~(e) ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)~~(f) **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not~~

~~operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

- ~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

5: The following updates have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the internet at <http://www.state.in.us/idem/air/rules/apcb/packets/index.html>. The rule revisions will be published in the February 1, 2002 Indiana Register which can be found on the internet at <http://www.IN.gov/legislative/register/index-25.html>

Conditions B.2, B.12(a)(b) and (g), B.14, and B.13 have been revised as follows:

Add the new rule cite to B.2 Permit Term

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicts with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

B.14 Prior Permits Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated

(2) revised, or

(3) deleted

by this permit

(b) All previous registrations and permits are superseded by this permit.

Remove (b) from B.13 Permit Shield. Since B.14 Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

~~B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

6: The Annual Compliance Certifications and the Part 70 Certification Report Form both listed the Compliance Data Section as the branch to send the above mentioned forms. However, the correct branch which the forms should be submitted to is the Compliance Branch. Therefore both of these conditions and forms are revised as follows (bolded language has been added, the language with a line through it has been deleted):

Condition B.10 and the Part 70 Certification Report Form have been revised as follows:

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit,

including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance ~~Data Section~~ **Branch**, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION BRANCH**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: PC Indiana Synthetic Fuels #2, LLC
Source Address: 7244 Brammer Road, Lynnville, IN 47619
Mailing Address: 3211D Frederica Street, Owensboro, KY 42301
Part 70 Permit No.: T173-13823-00041

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: PC Indiana Synthetic Fuels #2, LLC
Source Location: 7244 Brammer Road, Lynnville, IN 47619
County: Warrick
SIC Code: 2999
Operation Permit No.: T173-13823-00041
Permit Reviewer: Amy Cook

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from PC Indiana Synthetic Fuels #2, LLC relating to a synthetic fuel pellet production and curing operation.

Source Definition

PC Indiana Synthetic Fuel #2, LLC will produce synthetic fuel pellets and utilize a curing operation.

As determined in Construction Permit 173-9594-00041, issued on June 23, 1998, Peabody Coal Company and PC Indiana Synthetic Fuel #2, LLC are considered separate sources for the following reasons.

- (a) Information received from Peabody Coal Company indicates that PC Indiana Synthetic Fuel #2, LLC has purchased the land and coal fines slurry from Peabody Coal Company. There is no contractual agreement between Peabody Coal Company and PC Indiana Synthetic Fuel #2, LLC. PC Indiana can obtain coal slurry and/or raw coal from other sources and is not dependant on Peabody Coal Company. Peabody Coal Company produces 3,000,000 tons of coal per year, but only sends 1,000,000 tons (at maximum production rates) of coal slurry (which is not an output of Peabody Coal Company, rather, it is a by-product of Peabody Coal Company's coal production) to PC Indiana, where PC Indiana processes all of the 1,000,000 tons (at maximum production rates) of coal slurry per year and this is all of PC Indiana's total production. Based upon the source guidance from where one plant provides only 33% of its output to a second plant which is all of the second plant's output, there is not a support facility relationship. As such, Peabody Coal Company and PC Indiana Synthetic Fuel #2, LLC, are considered separate sources. Peabody Coal Company will continue to operate under their existing Source Specific Operating Agreement (SSOA) with the source ID# 173-00018 unaffected by the operating status of PC Indiana Synthetic Fuel #2. PC Indiana Synthetic Fuel #2, LLC is identified by source ID# 173-00041.
- (b) PC Indiana Synthetic Fuel #2, LLC and the Peabody Coal Company have different SIC Codes.
- (c) Different owner/operator.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b, consisting of:
 - (1) two (2) liquid propane gas fired vibrating curing furnaces using natural gas as a backup fuel, identified as Dryers EP02a and EP02b, respectively, each with a maximum capacity of one hundred forty (140) tons of pellets per hour, each with a rated heat input of 40 million British thermal units (MMBtu) per hour, each using two (2) cyclones as an integral part of the process, and each exhausting through one (1) wet scrubber to stack SV02a and SV02b, respectively;
- (b) Conveying for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons per hour, consisting of:
 - (1) one (1) pellet conveyor (EP01), one (1) dry pellet conveyer (EP03), one (1) loadout conveyor (EP06), each with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
- (c) Unloading for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons per hour, consisting of:
 - (1) two (2) collection hopper furnace discharges, identified as EP05 and EP07, each with a maximum capacity of one hundred forty (140) tons of pellets per hour and exhausting fugitively;
 - (2) one (1) truck loading operation, identified as EP08, with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
- (d) Conveying for the synthetic fuel pellet production operations, consisting of:
 - (1) two (2) feed bins with variable speed feed conveyors (EP14 and EP15), two (2) pellet feed conveyors (EP19 and EP20), each with a maximum capacity of one hundred forty (140) tons of pellets per hour and exhausting fugitively;
 - (2) one (1) feed conveyor (EP11), one (1) mixer feed conveyor (EP12), two (2) pugmill conveyors (EP13 and EP17), one (1) mixer product conveyor (EP18), one (1) finished product collecting conveyor (EP09), one (1) pellet transfer conveyor (EP10), each with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively;
 - (3) one (1) recycle conveyor (EP21) with a maximum capacity of two (2) tons of pellets per hour and exhausting fugitively.
- (e) Screening for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons of pellets per hour, consisting of:
 - (1) one (1) plant protection screen (EP16), with a maximum capacity of two hundred eighty (280) tons of pellets per hour and exhausting fugitively; and
- (f) One (1) radial stacker, identified as EP04, for the synthetic fuel pellet production operations, with a maximum capacity of two hundred eighty (280) tons of pellets and exhausting fugitively.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels:
 - (1) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day, such as filling of tanks, locomotives, automobiles, having a capacity equal to or less than ten thousand five hundred (10,500) gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to ten thousand (10,500) gallons, and dispensing less than or equal to two hundred thirty thousand (230,000) gallons per month.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3]
- (e) Closed loop heating and cooling systems.
- (f) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
[326 IAC 6-5]
- (h) Emergency generators as follows:
 - (1) Gasoline generators not exceeding one hundred ten (110) horsepower.
 - (2) Diesel generators not exceeding one thousand six hundred (1,600) horsepower.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 173-9594-00041, issued on June 23, 1998; and
- (b) CP 173-10815-00041, issued on August 13, 1999; and
- (c) Amendment 173-13829-00041, issued on June 13, 2001.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP 173-9594-00041, issued on June 23, 1998

Condition 7:

NSPS Reporting Requirement

That pursuant to the New Source Performance Standard (NSPS), Part 60.250 through 60.254, Subpart Y, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times.

- (1) Commencement of construction date (no later than 30 days after such date);
- (2) Anticipated start-up date (no more than 60 days or less than 30 days prior to such date);
- (3) Actual start-up date (within 15 days after such date); and
- (4) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM-OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.

- (b) CP 173-9594-00041, issued on June 23, 1998

Condition 10:

Opacity Limitations

That pursuant to the New Source Performance Standard (NSPS), Part 60.250 through 60.254, Subpart Y, on or after the date on which the performance test require to be conducted by 40 CFR Part 60.8 is completed, the emissions from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal shall not exceed 20 percent opacity.

Reason (a) and (b) not incorporated:

CP 173-9594-00041 originally contained both Peabody Coal Company and PC Indiana Synthetic Fuel #2, LLC as contiguous sources. However, as the Technical Support Document (TSD) of this permit states on pp. 1 of 10, these two sources are in fact separate. Since the coal mining and preparation operation at Peabody Coal Company are separate from the synthetic fuel pellet production and curing operation at PC Indiana Synthetic Fuel #2, LLC, Subpart Y does not apply, due to the fact that PC Indiana is not a coal preparation plant.

- (c) CP 173-9594-00041, issued on June 23, 1998

Condition 15:

Reagent Tank

The reagent tank (TK-1) is subject to the record keeping requirements of 40 CFR 60.116b(b). Pursuant to these requirements, the owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Records shall be kept for the life of the vessel.

Reason not incorporated:

CP 173-9594-00041 originally contained both Peabody Coal Company and PC Indiana Synthetic Fuel #2, LLC. However, as the Technical Support Document

(TSD) of this permit states on pp. 1 of 10, these two source are in fact separate. Since the reagent tank (TK-1) is owned by the Peabody Coal Company, it is not included in this permit.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the two (2) cyclone units, each unit consist of two (2) cyclones, be considered as an integral part of the drying and curing ovens according to CP 173-10815-00041, issued on August 13, 1999.

- (a) For the curing, the pellets will be transported to one of the two proposed pellet curing dryers. The dryers are air-drying vibrating units. The fuel used will be liquid propane and/or natural gas. The fuel will be burned and forced through a plenum beneath the vibrating plate of the dryer and up through holes in the plate. The hot air rising through the pellets will create a fluidized bed of synthetic fuel pellets. The smaller fragments of the pelletized fuel will be entrained in air, at worst case, up to 10% of the dryer feed. The material entrained in the air is a useable product despite the fact that the size is not optimal, causing it to become entrained in the air.
- (b) The material will be discharged to the pellet collection conveyor and be combined with other pellets as a product. Due to the nature of the cyclonic collection units, they are an integral part of curing dryer process
- (c) The capital cost for the dual cyclones to be installed totals \$188,000 for all cyclones. The operational cost is essentially zero as there are no moving parts. Therefore, using a ten-year life cycle and 6% interest, the annualized cost is estimated to be \$33,667.

The additional revenue generated by the operation of the cyclones can also be calculated. The total loading to all cyclones is 13 tons per hour, with control efficiency of approximately 77%. Therefore approximately 10 tons per hour of product will be recovered each hour and sold at the current price of \$20 per ton. This amounts to \$200 per hour in increased sales, with a maximum potential of \$1,752,000 per year in sales.

As indicated by the calculations, the annual benefit from the recovered material overwhelmingly exceeds the cost of the operation of the cyclones. Therefore, from an economic standpoint the payback from the product recovered far exceeds the total cost of the control device so it is considered integral.

IDEM, OAQ has evaluated the justifications and agreed that the two (2) cyclones will be considered as an integral part of the drying and curing ovens. Therefore, the permitting level will be determined using the potential to emit after the two (2) cyclones. Operating conditions in the proposed permit will specify that the two (2) cyclones shall operate at all times when the drying and curing ovens are in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was

received on January 25, 2001.

A notice of completeness letter was mailed to the source on June 12, 2001.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Appendix A, pages 1 through 3).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	65,172.42
PM-10	65,172.42
SO ₂	0.21
VOC	1.93
CO	29.43
NO _x	70.86

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the emission data from Construction Permit 173-10815-00041 issued June 23, 1998 and Amendment 173-13829-00041 issued on June 12, 2001.

Pollutant	Actual Emissions (tons/year)
PM	170.48
PM-10	170.48
SO ₂	0.15
VOC	1.37
CO	20.96
NO _x	50.48

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
two (2) synthetic fuel pellet production and curing operations, (EP02a and EP02b)	143 ¹	143 ¹	0.21 ²	1.93 ²	29.43 ²	70.86 ²	0.00
Radial Stacker (EP04)	12.26 ³	12.26 ³	0.00	0.00	0.00	0.00	0.00
Screens (EP16)	9.81 ³	9.81 ³	0.00	0.00	0.00	0.00	0.00
two (2) collection hopper furnace discharges (EP05 and EP07)	0.61 ³	0.61 ³	0.00	0.00	0.00	0.00	0.00
Conveyors	73.62 ³	73.62 ³	0.00	0.00	0.00	0.00	0.00
Total Emissions	239.30	239.30	0.21 ²	1.93 ²	29.43 ²	70.86 ²	0.00

1 - PM/PM10 emissions of EP02a and EP02b are based on enforceable control devices.

2 - PTE of NO_x, CO, VOC and SO₂ are uncontrolled PTE

3 - PM/PM10 PTE of EP04, EP16, EP05, EP07 and conveyors are uncontrolled

County Attainment Status

The source is located in Warrick County.

Pollutant	Status
PM-10	attainment
SO ₂	unclassifiable
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Warrick County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Warrick County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to

meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.250 through 60.253, Subpart Y), due to the type of operation at the source. This synthetic fuel pellet production and curing operation is not a coal preparation plant as it does not prepare coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD Minor Limit)

- (a) For the fuel pellet production and curing operations, EP02a and EP02b, the particulate matter (PM) and the particulate matter less than 10 microns (PM10) emissions shall be limited to less than 0.12 pounds per ton. For the radial stacker, screens, loading, conveyors, the particulate matter less than 10 microns emissions shall be limited to less than 0.08 pounds per ton. Compliance with these limits make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Particulate matter equals particulate matter less than 10 microns. For the radial stacker, screens, loading, conveyors, compliance with this limit will also satisfy rule 6-3.
- (b) Any increase in emissions that exceed two hundred fifty (250) tons per year shall require prior approval by IDEM, OAQ.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM and PM10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the synthetic fuel pellet production and curing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Control Efficiency %	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
synthetic fuel pellet production and curing operation, EP02a	140	7,420	99.78%	16.32	54.72
synthetic fuel pellet production and curing operation, EP02b	140	7,420	99.78%	16.32	54.72

The synthetic fuel pellet production and curing operation, identified as EP02a and EP02b, utilizes dual cyclones and wet scrubbers for particulate matter control in order to comply with 326 IAC 6-3-2 (Process Operations). The particulate matter emissions from the rest of the source are in compliance with 326 IAC 6-3-2 without any add on control equipment.

The dual cyclones and wet scrubbers for PM control shall be in operation at all times when the two (2) synthetic fuel pellet production and curing operations, identified as EP02a and EP02b are in operation.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the brazing, cutting, soldering, and welding equipment shall not exceed allowable PM emission based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and
P = process weight rate in tons per hour

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to this rule, the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM [326 IAC 6-4-5(c)].

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on March 23, 1998. This plan consists of:

- (a) wet suppression of dust from unpaved haul roads on an as needed basis.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The two (2) synthetic fuel pellet production and curing operation, identified as EP02a and EP02b, has applicable compliance monitoring conditions as specified below:
 - (1) Daily visible emissions notations of the two (2) synthetic fuel pellet production and curing operation shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the wet scrubbers controlling the two (2) synthetic fuel pellet production and curing operation, at least once daily when EP02a and EP02b are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the wet scrubbers shall be maintained above 11.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the wet scrubbers for the two (2) synthetic fuel pellet production and curing operation process must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (3) An inspection shall be performed each calendar quarter of all cyclones controlling the two (2) synthetic fuel pellet production and curing operation, identified as EP02a and EP02b, when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the

atmosphere and every time three months thereafter. Inspections are optional when venting to the indoors.

- (4) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Conclusion

The operation of this synthetic fuel pellet production and curing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T173-13823-00041**.

Appendix A
Synthetic Pellet Curing Facility
PC Indiana Synthetic Fuel #2 - Calculation of Potential Emissions
 <Based on maximum hourly production at 8760 hours per year>
 Company Name: PC Indiana Synthetic Fuels #2, LLC
 Address City IN Zip: 7244 Brammer Road, Lynnville, IN 47619
 Part 70 Permit: T173-13823-00041
 Reviewer: Amy Cook
 Date: August 28, 2001

ID#	Source	Increase in production (tons/hr)	Maximum Quantity Consumed (tons/yr)	Pollutant	Emission Factor (lbs/ton)	Emissions before control (tons/year)	Control Efficiency (%)	Potential Emissions <tons per year>
EP02	2 Pellet Curing Dryers <tons of pellets>	140	1226400	PM	53.00	32,499.60	0.9978	71.5 each (143 total)

Radial Stacker - PM Emissions

<Based on maximum hourly production at 8760 hours per year>

ID#	Increase in Production (tons/hr)	Increased throughput (tons/yr)	Emission Factor (lbs/ton)	Emissions before control (tons/year)	Emission before control (lbs/hr)	Control Efficiency (%)	Emission after controls (tons/yr)	Emissions after controls (lbs/hr)
EP04	280	2452800	0.0100	12.26	2.8	0.00%	12.26	2.8

Screens - PM Emissions

<Based on maximum hourly production at 8760 hours per year>

ID#	Increase in Production (tons/ hr)	Increased throughput (tons/yr)	Emission Factor (lbs/ton)	Emission before control (tons/yr)	Emissions before control (lbs/hr)	Control Efficiency (%)	Emissions after control (tons/yr)	Emission after control (lbs/hr)
EP16	280	2452800	0.0080	9.81	2.24	0.00	9.81	2.24

POTENTIAL EMISSION CALCULATIONS

Source: Conveyors

ID Number	Process	Maximum Rate (tons/hr)	PM/PM-10 Emission Factor (lbs/tons)	Emission Rate (lbs/hr)	Maximum Uncontrolled Emissions (tons/yr)	Control Efficiency (%)	Maximum Controlled Emissions (tons/yr)
EP01	Pellet Conveyor	280	0.01	2.8	12.26	50	6.13
EP03	Dry Pellet Conveyor	280	0.01	2.8	12.26	50	6.13
EP04	Radial Stacker	280	0.01	2.8	12.26	0	12.26
EP06	Loadout conveyor	280	0.01	2.8	12.26	50	6.13
EP09*	Finished product collecting conveyor	280	0.01	2.8	12.26	50	6.13
EP10*	Pellet transfer	280	0.01	2.8	12.26	50	6.13
EP11	Feed conveyor	280	0.01	2.8	12.26	50	6.13
EP12	Mixer feed conveyor	280	0.01	2.8	12.26	50	6.13
EP13	Pugmill conveyor	280	0.01	2.8	12.26	50	6.13
EP14	Feed bin w/ variable speed conveyor	140	0.01	1.4	6.13	50	3.07
EP15	Feed bin w/ variable speed conveyor	140	0.01	1.4	6.13	50	3.07
EP17	Pugmill conveyor	280	0.01	2.8	12.26	50	6.13
EP18	Mixer product conveyor	280	0.01	2.8	12.26	50	6.13
EP19	Pellet mill feed conveyor	140	0.01	1.4	6.13	50	3.07
EP20	Pellet mill feed conveyor	140	0.01	1.4	6.13	50	3.07
EP21	Recycle material	2	0.01	0.02	0.09	50	0.04

Source of Emission Factors:	Previously issued permits CP173-9594 and CP173-10815
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NOTES:

* Conveyors EP09 and EP10 are used to bypass the oven curing operation, emission units EP02A, EP02B, EP07, and EP05. The oven curing operation has a greater potential to emit than the bypass, and therefore should be used when calculating the potential to emit of the entire source.

POTENTIAL EMISSION CALCULATIONS

Source: Loading

ID Number	Process	Maximum Rate (tons/hr)	PM/PM-10 Emission Factor (lbs/ton)	Emission Rate (lbs/hr)	Maximum Uncontrolled Emissions (tons/yr)	Control Efficiency (%)	Maximum Controlled Emissions (tons/yr)
EP05	Collection hopper (change description to Furnace Discharge)	140	0.001	0.14	0.61	50	0.31
EP07	Collection hopper (change description to Furnace Discharge)	140	0.001	0.14	0.61	50	0.31
EP08	Truck loading	280	0.001	0.28	1.23	0	1.23

Source of Emission Factors:	Previously issued permits CP173-9594 and CP173-10815
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NOTES:

* Conveyors EP09 and EP10 are used to bypass the oven curing operation, emission units EP02A, EP02B., EP07, and EP05. The oven curing operation has a greater potential to emit than the bypass, and therefore should be used when calculating the potential to emit of the entire source.